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FILED

Clerk

District Court

OCT 27 2005

For The Northern Mariana Islands

By \_\_\_\_\_  
(Deputy Clerk)

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*Attorneys for Defendant World Corporation*

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE**

**NORTHERN MARIANA ISLANDS**

YU SUK CHUNG,

Plaintiff,

vs.

WORLD CORPORATION,

Defendant.

CIVIL CASE NO. 04-00001

REQUEST FOR VOIR DIRE  
QUESTIONS OF  
PROSPECTIVE JURORS

Now comes the defendant in the above-captioned matter and requests that the Court ask the following questions of prospective jurors in addition to the questions which the Court ordinarily asks:

**PROPOSED VOIR DIRE QUESTIONS**

Ladies and gentlemen, it is extremely important to both the plaintiff and the defense that the jury seated in this case be fair and impartial. Many people have had experiences in their lives which influence the way they think about certain things. These experiences can affect the way a prospective juror will act in a case and whether that prospective juror can accept and apply the law as it is to a certain factual situation. A person may be qualified to sit as a juror in one kind of case but not in another.

We are now about to pick a jury in this case. It is important that you each answer the following questions truthfully and accurately.

Please indicate if you respond affirmatively to any question.

1. Have you heard anything about this case from any source whatsoever?

a. If so, what have you heard? b. Has anything that you have heard caused you to form an opinion about this case? c. If so, what is that opinion?

2. Are you acquainted with the plaintiff, or any of the prospective witnesses in this case?

a. If so, what is your relationship with him or with the witnesses?

3. Are you acquainted with the plaintiff's attorneys, Robert Torres and Colin Thompson?

a. If so, what is your relationship with him or with the witnesses?

4. Is there anything about the nature of this case which you think would make it difficult for you to try the issues fairly and impartially without any prejudice or bias?

Individual voir dire:

5. Have you ever been fired from a job?

a. If so, when did it occur?

b. What were the results?

c. Did you have to testify at any proceeding in or out of court?  
What was the result of that proceeding?

d. Were you satisfied with the result?

1 e. How would your experiences affect you in deciding this case?

2 6. Have you ever worked in the private sector?

3 7. Is there anything in any of the questions that I have asked you which causes  
4 doubt in your mind as to your ability to reach a verdict based upon the evidence  
5 offered in this courtroom alone?


6 As reason for this motion Defendant states that such inquiry is reasonably  
7 necessary to ferret out hidden prejudices and therefore to permit the selection of a  
8 fair and impartial jury in this case.

9 The presentation of additional voir dire questions is within the discretion of the  
10 trial judge. We ask this Court to exercise its discretion in favor of asking these  
11 questions.

12 Respectfully submitted,

13 DATED this 27th day of October, 2005.

14 **MATTHEW T. GREGORY, ESQ.**  
15 **LUJAN UNPINGCO AGUIGUI & PEREZ LLP**

16 By:   
17 **MATTHEW T. GREGORY, ESQ.**  
18 Attorneys for World Corporation  
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